

James T. Shirley, Jr. (JTS 6114)
HOLLAND & KNIGHT LLP
195 Broadway
New York, NY 10007-3189
(212) 513-3200

Attorneys for Plaintiffs Michael Williamson, The Estate of Don C. Craft, Kirk O'Donnell, John Lettow, Timothy McGinnis, Fred Newton, William Watson, Chris Hancock, Dale Schoeneman, and International Deep Sea Survey, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICHAEL WILLIAMSON, THE ESTATE OF
DON C. CRAFT, KIRK O'DONNELL,
JOHN LETTOW, TIMOTHY MCGINNIS,
FRED NEWTON, WILLIAM WATSON, CHRIS
HANCOCK, DALE SCHOENEMAN, and
INTERNATIONAL DEEP SEA SURVEY, INC.,

Plaintiffs,

v.

RECOVERY LIMITED PARTNERSHIP,
COLUMBUS EXPLORATION, LLC,
COLUMBUS-AMERICA DISCOVERY GROUP, INC.
COLUMBUS EXPLORATION LIMITED
PARTNERSHIP, OMNI ENGINEERING, INC.,
OMNI ENGINEERING OF OHIO, INC.,
ECONOMIC ZONE RESOURCE ASSOCIATES,
ECONOMIC ZONE RESOURCE ASSOCIATES, LTD.,
EZRA, INC., EZRA OF OHIO, INC., ECON
ENGINEERING ASSOCIATES, INC., DOE.E, INC.,
THOMAS G. THOMPSON, GILMAN D. KIRK,
JAMES F. TURNER, MICHAEL J. FORD, and
W. ARTHUR CULLMAN, JR.,

Defendants.

06 Civ. 5724

AFFIDAVIT IN SUPPORT
OF ATTACHMENT

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

JAMES T. SHIRLEY, JR., being duly sworn, deposes and says:

1. I am a member of the firm of Holland & Knight LLP, attorneys for plaintiffs Michael Williamson, The Estate of Don C. Craft, Kirk O'Donnell, John Lettow, Timothy McGinnis, Fred Newton, William Watson, Chris Hancock, Dale Schoeneman, and International Deep Sea Survey, Inc. (collectively, "Plaintiffs"), and I am duly admitted to practice before the United States District Court for the Southern District of New York.

2. I am familiar with the facts and circumstances underlying this dispute and I am submitting this affidavit in support of the Verified Complaint and the Writ of Attachment.

3. Defendants are not listed in the telephone directory of the principal metropolitan areas in this district, nor are they listed in the Transportation Tickler, a recognized commercial directory in the maritime industry.

4. To the best of my information and belief, none of the Defendants can be found within this district or within the State of New York.

5. Our office contacted the Secretary of State for the State of New York and was advised that none of the corporate Defendants were New York business entities, nor were they foreign business entities authorized to do business in New York. As for the individual Defendants, they are all residents of the State of Ohio and are not present within this jurisdiction.

6. Based upon the facts set forth in the Verified Complaint, I respectfully submit that Defendants are liable to Plaintiffs for the damages alleged in the Verified Complaint, which amounts, as best as can be presently determined, amount to a total of \$11,808,600.00, including estimated interest.

7. Upon information and belief, Defendants have property, goods, chattels or effects within this jurisdiction, to wit: funds or accounts held in the name (or names) of defendants Recovery Limited Partnership, Columbus Exploration, LLC, Columbus-America Discovery Group, Inc., Columbus Exploration Limited Partnership, Omni Engineering, Inc., Omni Engineering of Ohio, Inc., Economic Zone Resource Associates, Economic Zone Resource Associates, Ltd., EZRA, Inc., EZRA of Ohio, Inc., Econ Engineering Associates, Inc., DOE.E, Inc., Thomas G. Thompson, Gilman D. Kirk, James F. Turner, Michael J. Ford, and/or W. Arthur Cullman, Jr. at one or more of the following financial institutions:

Bank of America, N.A.

The Bank of New York

Citibank, N.A.

Deutsche Bank Trust Company Americas

HSBC Bank USA, N.A.

JPMorgan Chase Bank, N.A.

LaSalle Bank, N.A.

UBS AG

U.S. Bank, N.A.

Wachovia Bank, N.A.

Wells Fargo Bank, N.A.

Société Générale

Standard Chartered Bank

BNP Paribas

Calyon Investment Bank

American Express Bank

Commerce Bank

ABN Amro Bank

Bank Leumi USA

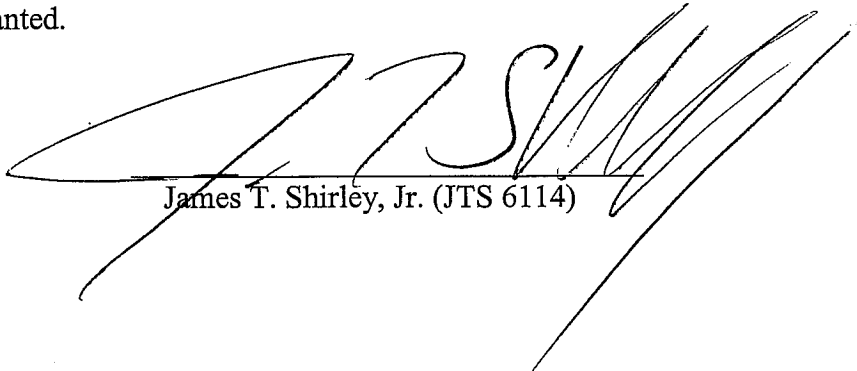
Credit Suisse

Fortis Financial Groups

Banco Popular

8. Plaintiffs are, therefore, requesting that this Court, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, issue a writ of maritime attachment for an amount up to \$11,808,600.00.

WHEREFORE, Plaintiffs respectfully request that the application for a writ of maritime attachment and garnishment be granted.



James T. Shirley, Jr. (JTS 6114)

Sworn to before me this
28th day of July, 2006



Notary Public

ELVIN RAMOS
NOTARY PUBLIC, State of New York
No. 41-4870243
Qualified in Queens County
Certificate Filed in New York County
Commission Expires September 2, 2006 